

OFFICE OF
GENERAL COUNSEL

1

June 19, 2018

2018 JUN 21 PM 3:30

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: Indivisible Washington's 8th District Complaint

MUR # 7417

To Whom it May Concern:

I am writing to you today to inform you of a series of serious federal campaign finance violations committed by Indivisible Washington's 8th District. The apparent violations are outlined in the following pages and the document is signed and notarized at the end of the complaint.

Contents

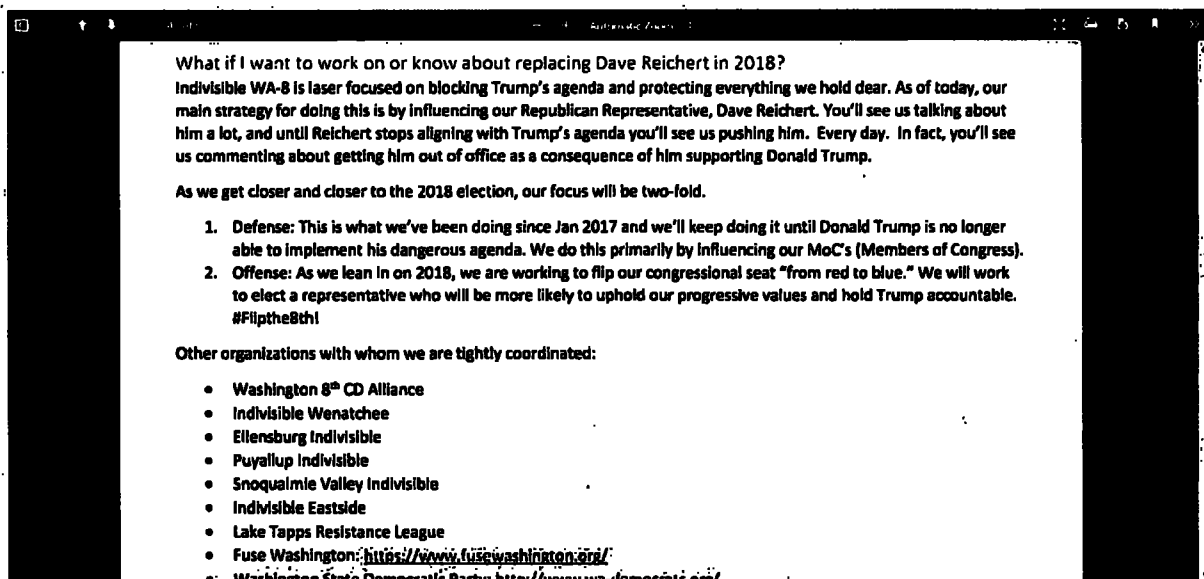
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INDIVISIBLE WASHINGTON'S 8TH DISTRICT

1. PARTISAN INTENT

Spending and fundraising undertaken by the organization Indivisible Washington's 8th District is specifically for one purpose, as stated in their FAQs posted on their private Facebook group: "to flip our congressional seat 'from red to blue'" – an explicitly partisan purpose. This is supported by the founder of an affiliated group (Ellensburg Indivisibles) saying of their collection of Indivisible groups that "Flipping the 8th CD to blue is only [sic] agenda of these groups." The founder of Indivisible Washington's 8th District has also stated that "it is time to play offense against Dino Rossi and the GOP" – a clear statement of partisan intent to influence an election for public office.

Indivisible Washington's 8th District has disclosed absolutely nothing in terms of fundraising and spending, putting them in gross violation of Federal Elections Commission rules. This section documents the many ways in which this organization has spent and raised money, and how their lack of disclosure is in violation of the law.



10047496304



Sheril Bechard shared a link

1 hr

Expires in 23 hours

TIME IS RUNNING OUT!!

It is essential registration be done by noon tomorrow.

EI is second in member enrollment over all the other 5! Proud of us. There are nearly 900 EI members, 450 active and 55+ enrolled.

This has been a long progression to endorsement of candidate (66% + 1) vote. Interview committee sent out questions, candidates (Jason, Shannon, Kim) answered, then a one-on-one interview of 50 mins with each happened two weeks ago in Issaquah (I am on interview committee). All questions and answers are available in near future for you after you enroll. Also, links to all four forum streaming videos will be sent to you after registration for more informed vote. Registration stops on Saturday, March 10th at noon. Voting Period from March 10 at 6pm until March 20th, 6pm.

Why is District 8 Indivisible groups endorsing a candidate? Flipping the 8th to blue is only agenda of these 6 groups. We expect the grassroots teams and voters of District 8 to elect best candidate without outside influences. Make your voice heard! It shouldn't be folks from outside the district who determine who the best candidate is.. It should be us!

Six Indivisible groups across the district have joined forces to jointly endorse a candidate for Congress in an effort to educate our members, focus the candidates, and replace Reichert with a Progressive who listens to us. We are:

- Ellensburg Indivisible
- Indivisible Puyallup
- Indivisible Washington's 8th District
- Indivisible Wenatchee
- Snoqualmie Valley Indivisibles
- WA CD8 Alliance

100474600001

Chris Petzold

@chris_p_2010

Following

We are so excited to announce our dual endorsement of @JRittereiser and @DrKimSchrier for the 8th CD. We've been working on defense for over a year. Now time to play offense against Dino Rossi and the #GOP!

Indivisible WA 8 @Indivisible_WA8

Coalition of Indivisible groups across #WA8 announces endorsement of @JRittereiser and @DrKimSchrier in the upcoming congressional primary.

1:36 PM - 21 Mar 2018

1 Retweet 2 Likes



1



2



Lead Mail (not) • Indivisible:

Wenatchee

Admin 2 hrs

Like

Comment

2

Write a comment...

Press enter to post



IndivisibleinWa and 1 other liked



Indivisible WA 8 @Indivisible_WA8 · 9h


Working to ensure @DinoRossiWA loses in WA...again!



👍 2 ❤️ 6 📧

1604440061



 **Last Hall Isola** • Indivisible Wenatchee
Admin · 2 hrs · 🌐

👍 Like

💬 Comment

👤 4

Write a comment...

👤 Enter to post

A. LOGO DESIGN

Auburn WA Flip Congre...



Centwell
Seattle (206) 220-6400
DC (202) 224-3441

-+ JOHN GROUT

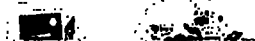
* * * More

Description

OBJECTIVE: Patriots standing indivisible to defend our country from Trump's agenda.

A SPACE FOR JUST THE PEOPLE YOU WANT

Groups are great for getting things done and staying in touch with just the people you want.



B. BANNER PRINTING

On 3/3/18, a professionally printed banner for Indivisible Washington 8th District was displayed at a candidate forum. This is clearly an in-kind contribution or expenditure.



(Picture L-R, Shannon Hader, Jason Rittereiser, Kim Schrier at a candidate forum on 3/3/18 in Sammamish)

C. WEBSITE HOSTING & DISCLAIMER

The website of Indivisible Washington 8th District (<http://www.indivisible-wa8.com>) has no political disclaimer on it and has no indication of who is paying the hosting fees.




[About Us](#)
[Get Involved](#)
[In the Media](#)
[Resources](#)
[Facebook](#)
[Calendar](#)

More about how to join us.


Our History

We are a local chapter of the indivisible movement and are inspired by the Indivisible Guide. The Indivisible Guide was written by a group of former Congressional staffers who witnessed the Tea Party minority block President Obama's agenda. Let's do the same for Trump's agenda.

Indivisible Washington's Eighth District was founded as a Facebook Group in January 2017. Since then, we have received an outpouring of local support, and we have more than 1,000 members.

[Media Contact](#)



The NRA faces a new kind of opponent: Ki...
This time, teenagers are loading the charge. ...

[Twitter](#) [View on Twitter](#)

1004440010

D. PO BOX

At the bottom of their daily email blast, Indivisible Washington's 8th District lists a PO Box in Issaquah, WA. This particular box costs around \$130 for a year, which is at least as long as they have had the box. No disclosure has occurred detailing who is paying for this PO Box.

Opposition letter of Americans for Financial
Reform: <http://ourfinancialsecurity.org/> AFR: Letter Re: HFC-11...



Copyright © 2018 Indivisible Washington's 8th District, All rights reserved
You have elected to stand, Indivisible with us to resist the Trump Agenda!

Our mailing address is:
Indivisible Washington's 8th District
Indivisible WA 8
1567 Highlands Dr NE, Suite 110-273
Issaquah, WA 98029

[Add us to your address book](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#)

----- Forwarded message -----

From: **Indivisible Washington's 8th District** <Indivisiblewa8@gmail.com>

Date: Thu, Apr 20, 2017 at 1:39 PM

Subject: Show us Trump's taxes: Rally at Reichert's Office Friday 21 April

Indivisible WA-8 District

#TakeAction, content of this email is duplicated in Facebook

[View this email in your browser](#)

The logo of the National Association of Broadcasters (NAB) is located in the bottom right corner. It features a stylized mountain range with three peaks inside a circle, with a larger circle above it.

th District

Here's the public page event info ... share with friends. <https://www.facebook.com/events/127321617809290/>



You have elected to stand, indivisible with us to resist the Trump Agenda!

Our mailing address is:
Indivisible Washington's 8th District
Indivisible WA 8
1567 Highlands Dr. NE, Suite 110-273
Issaquah, WA 98029

10054161001

E. CANDIDATE FORUM WITH KIM SCHRIER, JASON RITTEREISER, & SHANNON HADER

On 3/18/18 Indivisible Washington's 8th District hosted a candidate forum with three of the Democratic candidates running for the 8th Congressional seat. Invitations to participate in this forum were only sent to these three Democratic candidates. Indivisible Washington's 8th District stated repeatedly that the purpose of this forum was to help it make its endorsement decision, to winnow the Democratic field, and to help a Democrat win the seat in November.

On the Eventbrite and Facebook pages for this event, donations were solicited in order to help defray the cost of the event. These donations were collected at the door and partially in cash, making it unlikely that Indivisible is tracking the donor names, amounts, or other relevant information for FEC filing. In April 2018, Chris Petzold posted that they had \$150 in surplus funds from the event, which she was donating to charity, indicating that they had raised significantly more than \$150 from the event.

While the church that hosted the forum does not list specific prices, it is clear from their website that hosting events is not free, so it is likely that the church charged an individual or group for this forum.

Kim Schrier, Jason Ritterer, and Shannon Hader specifically benefited from this forum, since it not only excluded non-Democrat candidates, it excluded many of the Democrat candidates. This is a clear instance of an in-kind donation: money was expended to give specific partisan candidates an advantage over other partisan candidates. None of these campaigns declared this in-kind donation, and no public disclosure of it has been made by any individual or committee to date.

18

Events

Events

Calendar

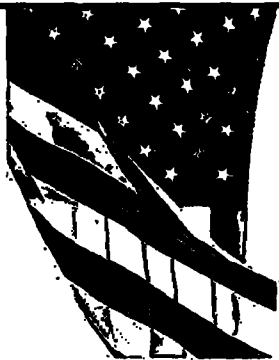
Birthdays

Discover

Indivisible WA-8 Candidate Forum

Past

+ Create Event



WA-8
CANDIDATE
FORUM

Indivisible
Washington's

8th
District

SATURDAY
MARCH 3, 2018
2PM

GOOD SAMARITAN
EPISCOPAL CHURCH
SAMMAMISH, WA

FOR MORE INFO CONTACT KAYLA:
KAYLAHILL@GMAIL.COM

MAR
3

Indivisible WA-8 Candidate Forum

Public · Hosted by Indivisible Washington's 8th District Page

★ Interested

✓ Going

➦ Share

...

🕒

Saturday, March 3 at 2 PM - 4 PM

📍

Good Samaritan Episcopal Church, Sammamish, WA

1757 244th Ave NE, Sammamish, Washington 98074

Show Map

About

Discussion

18 Events

Events

Calendar

Birthdays

Discover

Indivisible WA-8
Candidate Forum

Past

+ Create Event

Details

REGISTER HERE: <https://www.eventbrite.com/e/indivisible-wa-8-candidate-forum-tickets-42450692163>

We have a limited capacity and seats will go fast, so please register ASAP using the link above to secure your seat!

Indivisible Washington's 8th District is hosting a candidate forum for candidates running for the 8th congressional seat in 2018!

Please join us to learn more about the candidates, their views, and how they plan to support the people of the 8th district if they are elected.

Admission is free, but a suggested donation of \$3 would be greatly appreciated and go towards the costs of the event. Any leftover funds will be donated to the Issaquah Food Bank.

REGISTER AND DONATE HERE: <https://www.eventbrite.com/e/indivisible-wa-8-candidate-forum-tickets-42450692163>

Causes

24 Events

Events

Calendar

Birthdays

Discover

Indivisible WA-8
Candidate Forum

Past

+ Create Event

1757 244th Ave NE, Sammamish, Washington 98074

About

Discussion

24 Going · 63 Interested

Share this event with your friends

Share

Details

Indivisible Washington's 8th District is hosting a candidate forum for candidates running for the 8th congressional seat in 2018!

Please join us to learn more about the candidates, their views, and how they plan to support the people of the 8th district if they are elected.

Admission is free, but a suggested donation of \$3 would be greatly appreciated and go towards the costs of the event. Any leftover funds will be donated to the Issaquah Food Bank.

Causes

Share in Messenger

<https://www.facebook.com/events/334948063654603/>

<https://www.eventbrite.com/e/indivisible-wa-8-candidate-forum-tickets-42450692163>



11:00

REGISTER



DESCRIPTION

Indivisible Washington's 8th District is hosting a candidate forum for candidates running for the 8th congressional seat in 2018! Please join us to learn more about the candidates, their views, and how they plan to support the people of the 8th district if they are elected.

Admission is free, but a suggested donation of \$3 at the door would be greatly appreciated and go towards the costs of the event. Any leftover funds will be donated to the Issaquah Food Bank. We will also be taking non-perishable food and clothing donations as well. Please check the link for more needed items: <https://issaquahfoodbank.org/donate>

TABS

DATE AND TIME

Sat, Mar 4, 2018, 2:00 PM PST
Add to Calendar

LOCATION

Good Samaritan Food Bank
Cheney
1757 244th Ave NE
Sammamish, WA 98074
View Map

REFUND POLICY

No Refunds



Chris Petzold

Admin • 2 hrs

Just closing out the books on the candidate forum. Made a donation to the Issaquah Food and Clothing Bank with the proceeds. On behalf of us all. Thanks!

Thank you, Chris, for your donation to Issaquah Food and Clothing Bank.

Your donation of \$150.00 was received on April 6, 2018.

Other Amount \$150.00
You will only be charged once for the above item.

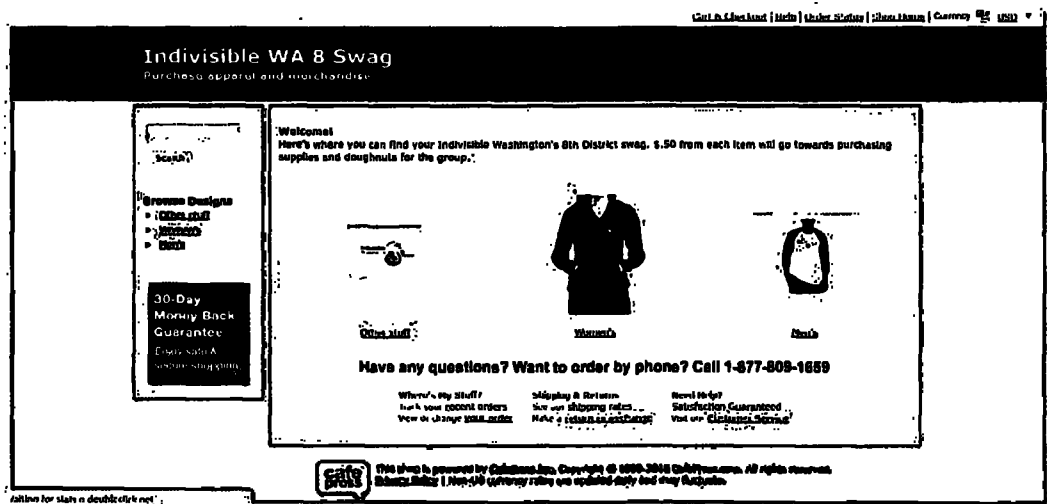
Transaction Total: \$150.00

1004410004100

F. MERCHANDISE SALES & PURCHASES

A substantial number of items with Indivisible Washington's 8th District's logo on it are on sale to help raise funds for the group. These items have clearly sold, since there are many photos of their members wearing these items. All revenue from these items is dedicated to the partisan aims of this group, making it subject to disclosure requirements.

Additionally, a substantial amount of food is brought to some of their meetings, which should be considered an in-kind contribution of goods and reported as such.





Admin · February 17



I tried to pick some fun items.. even included a pet t-shirt, maternity wear (hmmmmmm??) and a flask for those tough Trump days.

This weekend Café Press is offering 15% off. Enter code GIFT15 at the checkout. \$.50 from each item goes towards supplies for our group (like doughnuts, signs and more pink slips).

Indivisible WA-8 Swag

Welcome! Here's where you can find your indivisible Washington's 8th District swag. \$.50 from each item will go towards purchasing supplies and doughnuts for the group.

CAFEPRESS.COM



View 10 more comments





Chris Petzold shared a link.

Admin · February 17 at 4:54pm

Need some SWAG??

We're offering swag again! Janice is working on some amazing artwork for our next round of swag, but here's some more logo wear in the interim. I know some people were looking for shirts to wear to the forum on 3/3.

I tried to pick some fun items.. even included a pet t-shirt, maternity wear (hmmmm??) and a flask for those tough Trump days.

This weekend Café Press is offering 15% off. Enter code GIFT15 at the checkout. \$.50 from each item goes towards supplies for our group (like doughnuts, signs and more pink slips).

Indivisible WA-8 Swag

Welcome! Here's where you can find your Indivisible Washington's 8th District swag. \$.50 from each item will go towards purchasing supplies and doughnuts for the group.

CAFEPRESS.COM



Like



Comment

https://www.cafepress.com/indivisiblewashington8thswag/15233691

Search

Browse Designs

- Other stuff
- Women's
- Men's

Shop for one-of-a-kind gifts. Most orders ship in 24 hours.

<p>Men's Classic T-Shirt \$15.99</p>	<p>Organic Men's T-Shirt \$22.99</p>	<p>Organic Men's T-Shirt (Dark) \$23.99</p>
<p>Baseball Tee \$17.99</p>	<p>Dark T-Shirt \$20.99</p>	<p>Organic Men's Dark T-Shirt \$24.99</p>
<p>Men's Classic T-Shirt \$15.99</p>	<p>Organic Men's T-Shirt \$22.99</p>	<p>Organic Men's T-Shirt (Dark) \$23.99</p>

← → ↻ 🏠 <https://www.cafepress.com/indivisiblewashingtons8thswag/15234024> ☰ ⋮ ☆ 🔍 Search

Search

Browse Designs

- Other stuff
- Men's
- Kids

30-Day Money Back Guarantee

Free shipping on orders over \$35



Men's Classic T-Shirt
\$24.50



Graphic Women's T-Shirt
\$22.99



Women's Fitted T-Shirt (dark)
\$21.99



Women's Classic T-Shirt
\$18.99



Indivisible Washingtons T-Shirt
\$17.99



Women's Classic T-Shirt
\$18.99



Men's Classic T-Shirt
\$18.99



Women's Classic T-Shirt
\$17.99



Women's Classic T-Shirt
\$18.99

<https://www.cafepress.com/indivisiblewashingtons8thswag/225820070>


← → ↻ 🏠 <https://www.cafepress.com/indivisiblewashingtons8thswag/15234027> ☰ ⋮ ☆ 🔍 Search

Browse Designs

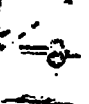
- Other stuff
- Men's
- Kids

Shop for one-of-a-kind gifts


Mass custom gift in 24 hours




Dog T-Shirt
\$17.99




John Bag
\$12.99




Molotov Bag
\$17.99




Indivisible Washingtons T-Shirt
\$12.99




Indivisible Washingtons T-Shirt
\$10.99




Stainless Water Bottle 1.0L
\$14.99



Flash
\$16.99



Stainless Water Bottle 0.5L
\$12.99



16 oz Travel Mug
\$14.99

<https://www.cafepress.com/indivisiblewashingtons8thswag>





19044465582

**Chris Petzold****Admin** · 2 hrs · Issaquah

Our crowd sizes are HUGE. And thanks for all the amazing food!

Whoever isn't here with us at the meeting today... you're missing out! Join us next month. ❤️



March 5 at 7 18pm

Can anyone bring treats to share on Saturday? We'll need fuel to caucus! 😊

👍 Like

💬 Comment

7

View 1 more comment

I WILL BE HAPPY TO BRING SOME BREAKFAST

COOKIES

Like · Reply · 1d

4

Of course, I will bring
treats! ❤️ She is our "Official Indivisible Hostess 😊!" She
hosts and treats all the time. SHE IS AMAZING!!!!!!!!!!!!!!
Thank you dear Sheryl for EVERYTHING YOU DO! We
love and appreciate you so much!

Like · Reply · 1d

3

ox And, BTW, I will also be happy to bring
some treats. And some fruit, etc. We are going to need
sustenance! See all you lovely people on Saturday! 🍌 🍌

Like · Reply · 1d

2

48/#

old 🍌 Oooh - we have the Hostess and the Social

1604746684

Of course I will bring
treats! She is our "Official Indivisible Hostess!" She
hosts and treats all the time. SHE IS AMAZING!!!!!!
Thank you dear Sheryl for EVERYTHING YOU DO! We
love and appreciate you so much!

Like · Reply · 1d



And, BTW, I will also be happy to bring
some treats. And some fruit, etc. We are going to need
sustenance! See all you lovely people on Saturday!

Like · Reply · 1d



Oooh - we have the Hostess and the Social
Director (Joy). Two very important roles.

Like · Reply · 1d



I can help with provisions. Is there a coffee
plan?

Like · Reply · 22h



See you on Saturday!



I'll bring some Costco muffins and croissants.

Like · Reply · 12h



Thank you Steven!!

Like · Reply · 12h



16044466585

G. COORDINATION WITH THE WASHINGTON STATE DEMOCRATIC PARTY

Indivisible Washington's 8th District appears to be closely coordinating with the Washington State Democratic Party. The Chair of the Party, Tina Podlodowski, has admitted in print that she has "directed" State Party donors to donate to the Indivisible groups in Washington State, presumably including the 8th District's group. In their "Frequently Asked Questions" document posted to their Facebook group, Indivisible Washington's 8th District lists the State Democratic Party as a group that they "tightly coordinate" with, further supporting the idea that the State Democrats have encouraged donors to monetarily support Indivisible Washington's 8th District.

theStranger

THINGS TO READ - THINGS TO DO -

leadership."

"We need an election, not a coronation," Hader added, echoing a phrase she expressed at recent candidate forums in Auburn and Sammamish.

A Democratic donor who requested anonymity to speak freely told me that "the message from Tina has been write a check to Kim, or wait until after the primary. I and others have heard that over the last couple months," this person said.

But Podlodowski says she hasn't directed donors to give to one candidate or another. Over e-mail she writes: "I've had several donors very frustrated with me since I won't tell them which candidate to give to. My advice is twofold in that case: either wait and find out more until the donors feels sure, or invest in organizations like the State Party, the local legislative district organizations, or groups like Indivisible."

In response to that, the donor who spoke with *The Stranger* said: "I'm not going to say she says that in every call, but I know she has made more than a small number of calls with the message to write a check to Kim or wait until after the primary. She has clearly had her thumb on the scale."

"The last thing we need is party bosses in Seattle trying to dictate to working people in the 8th District who should represent them or for whom they should be able to vote," Rittereiser said in a statement.

Schrier's spokesperson, Katie Rodihan, pushed back on these statements from the other Democratic candidates. "To say [Schrier's] success and momentum are the result of a backroom deal is a desperate attempt by her opponents to dismiss the

190444665886

<https://www.thestranger.com/slog/2018/03/06/25883425/is-the-democratic-party-playing-favorites-in-the-race-to-replace-dave-reichert/>

"But Podlodowski says she hasn't directed donors to give to one candidate or another. Over e-mail she writes: "I've had several donors very frustrated with me since I won't tell them which candidate to give to. My advice is twofold in that case: either wait and find out more until the donors feels sure, or invest in organizations like the State Party, the local legislative district organizations, or groups like Indivisible.""

What if I want to work on or know about replacing Dave Reichert in 2018?

Indivisible WA-8 is laser focused on blocking Trump's agenda and protecting everything we hold dear. As of today, our main strategy for doing this is by influencing our Republican Representative, Dave Reichert. You'll see us talking about him a lot, and until Reichert stops aligning with Trump's agenda you'll see us pushing him. Every day. In fact, you'll see us commenting about getting him out of office as a consequence of him supporting Donald Trump.

As we get closer and closer to the 2018 election, our focus will be two-fold.

1. Defense: This is what we've been doing since Jan 2017 and we'll keep doing it until Donald Trump is no longer able to implement his dangerous agenda. We do this primarily by influencing our MoC's (Members of Congress).
2. Offense: As we lean in on 2018, we are working to flip our congressional seat "from red to blue." We will work to elect a representative who will be more likely to uphold our progressive values and hold Trump accountable. #Flipthe8th!

Other organizations with whom we are tightly coordinated:

- Washington 8th CD Alliance
- Indivisible Wenatchee
- Ellensburg Indivisible
- Puyallup Indivisible
- Snoqualmie Valley Indivisible
- Indivisible Eastside
- Lake Tapps Resistance League
- Fuse Washington: <https://www.fusewashington.org/>

Washington State Democratic Party: <http://www.wa-democrats.org/>

1004440000007

H. FED EX KINKO'S PRINTING

A post on the Indivisible Washington's 8th District Facebook page requested a volunteer to pickup something from Fed Ex Kinko's. As it costs money to print at Fed Ex Kinko's, this is clearly an in-kind contribution or expenditure.



Chris Petzold

Admin · 16 hrs

****HELP WANTED****

Can someone volunteer for a task? It involves picking up something from Fed Ex Kinko's (Issaquah) tomorrow and then doing a little work with scissors.

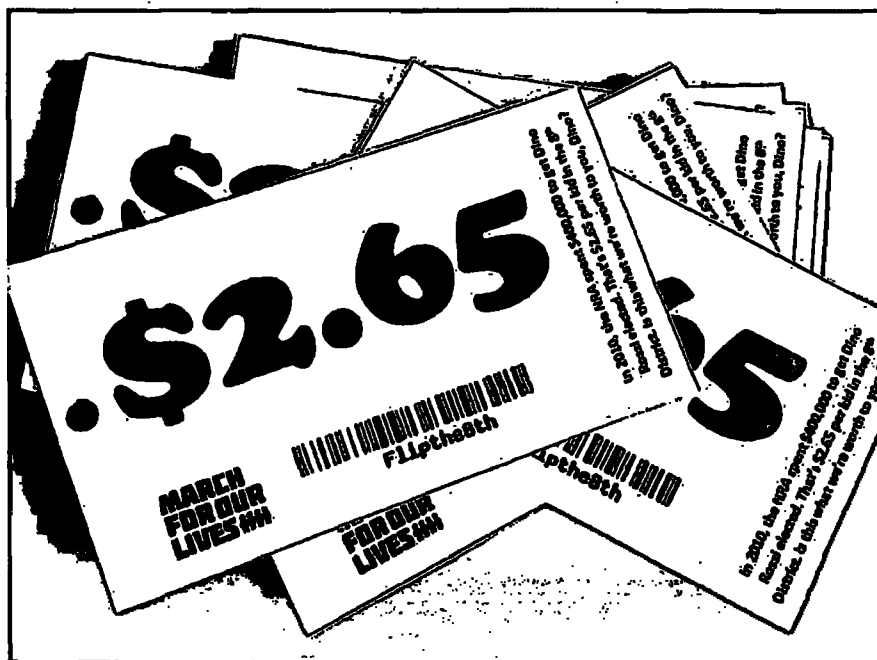
We are playing a small role in a thing that's happening. 😊 More later.



 Like



 Comment



Chris Petzold ▶ Indivisible
Washington's 8th District
Admin 312 777 1111

Admin 3 Dec 19



 Like



 **Comment**

What's a comment



People You May Know

[See All](#)

3. SUMMARY

Federal law requires a PAC to file with the FEC no more than ten days after raising or spending \$1,000 on a Federal election. The long list of items below indicates that it is highly likely that Indivisible Washington's 8th District has surpassed that mark long ago with the following items:

- Room rental fees/in-kinds
- PO Box fees
- Website hosting & design fees/in-kinds
- Food & drink purchases
- Banners
- Fundraising at their candidate forum on March 3rd
- Selling over twenty kinds of high-priced shirts, mugs, flasks, and other items
- Donations solicited for their organization by the Chair of the Washington State Democratic Party, Tina Podlowski
- Fed Kinko's Printing

Indivisible Washington's 8th District solicited, collected, and expended funds with the stated intent to give specific candidates and a specific party an advantage in a Congressional election, including by coordinating with and sharing donors with a major political party, having professionally printed materials, a website, active membership lists, endorsement processes, candidate forums, solicitation of donations, and sales of merchandise for fundraising purposes.

They did not disclose any of this activity, nor did the candidates benefiting from it. The bottom line is this: money was expended in order to boost specific candidates, but no one disclosed that spending. Whether it was Indivisible Washington's 8th District, the candidates Kim Schrier, Jason Ritterer, and Shannon Hader, or a combination thereof is for the FEC to determine, but it is clear that one or more of these parties broke the law.

Respectfully submitted,



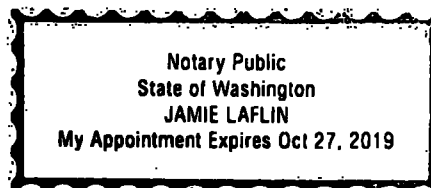
Dennis Olson

6830 NE Bothell Way, Suite C-426
Kenmore, WA 98028

Signed and sworn to before me this 19th day of June, 2018.



Notary Public



160474644091